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KENT H. LEE, JR.
SENIOR VICE PRESIDENT
SPECIALTY CHEMICALS

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Document Control Office (7407)
Office of Pollution Prevention and Toxics (OPPT)
United States Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Attn: Mr. Stephen L. Johnson, Assistant Administrator

**Re: Ferro Corporation and the Voluntary
Children's Chemical Evaluation Program**

Dear Mr. Johnson:

Ferro Corporation is in receipt of your March 20, 2001 letter requesting participation in the Voluntary Children's Chemical Evaluation Program (VCCEP). From our review, the only chemical on EPA's list of twenty-three chemicals targeted by the VCCEP that is commercially produced by Ferro is 1,4-dioxane (CAS number 123-91-1). In fact, Ferro is currently the only U.S. manufacturer of 1,4-dioxane. Based on the information provided by EPA, it is very unclear to us why 1,4-dioxane was included in this program. Additionally, we have seen data showing 1,4-dioxane as an incidental contaminant in many household products and fruits and vegetables, completely unrelated to the 1,4-dioxane manufacturing process. Nonetheless, Ferro is committed to environmental protection and we have evaluated very closely participating in the VCCEP.

We are pleased to tell you that Ferro will participate in Tier 1 of this pilot program and sponsor 1,4-dioxane (CAS no. 123-91-1) on a conditional basis. The primary reason for Ferro's participation is our belief that sufficient scientific studies have now been conducted that the risks associated with 1,4-dioxane can be assessed without additional testing. In the December 26, 2000 Federal Register notice on the VCCEP, it is stated that, "screening level hazard data were considered available if a Screening Information Data Set (SIDS) Initial Assessment Report (SIAR) had been prepared or if the chemical is in the evaluation phase." (65 FR 8 1705) Australia prepared a SIAR for 1,4-dioxane in 1999. Additionally, 1,4-dioxane has been extensively reviewed as part of the EU's Existing Substances program in 1996. Based on our review of these readily available studies, we believe that the hazards of this chemical will be shown to already have been evaluated sufficiently to meet Tier 1 criteria.

Ferro is committed to safely operating our manufacturing facilities as well as providing products that do not present an unreasonable risk. Ferro is heavily involved in the agency's HPV Challenge Program. We are involved through consortia with over two-dozen chemicals. In the case of 1,4-dioxane, Ferro is now the only U.S. producer of this chemical. Contrary to some reports regarding the amount of 1,4-dioxane produced annually, the volumes have dropped markedly in the past two decades. In 2001, we anticipate producing only around 500 tonnes at our Baton Rouge, Louisiana facility.

As a participant in VCCEP, we anticipate a start date for collection of hazard and exposure information of October 1, 2001. Based on our expectation that sufficient information is available and no additional testing is needed, we anticipate completing this evaluation and development of a final report by December 1, 2002. We would expect any importers of 1,4-dioxane to participate and share in the cost of this program if testing is involved. If importers were to take economic advantage due to non-participation, or additional testing requirements were to pose an economic hardship for Ferro, we would need to re-evaluate our participation in the VCCEP.

Ferro's technical contact for this program will be Mr. John Bogosian, Business Manager, Ferro Corporation, 7500 East Pleasant Valley Road, Independence, OH 44131. He can be reached at 856-467-3000, and the fax number is 856-467-8308. His email address is bogosianj@ferro.com.

We look forward to working cooperatively with U.S. EPA and other stakeholders in the VCCEP. Ferro believes that voluntary and collaborative programs like this are key to the success of environmental and health initiatives, and ensuring stewardship for the products produced by our industry.

If there are any questions, please do not hesitate to contact Mr. Bogosian. We look forward to hearing back from EPA on this program.

Sincerely,

Kent H. Lee, Jr.
Senior Vice President
Specialty Chemicals